

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF THE U.S. VIRGIN ISLANDS  
DIVISION OF ST. CROIX**

BEECHER COTTON, PAMELA COLON,  
SIRDINA ISAAC-JOSEPH, ESTHER  
CLIFFORD, SYLVIA BROWNE, ALVINA  
JEAN-MARIE ILARRAZA, RYAN  
ALLEYNE, AGNES AUGUSTUS, and  
CESARINA MIRANDA, individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

LIMETREE BAY VENTURES, LLC,  
LIMETREE BAY HOLDINGS, LLC,  
LIMETREE BAY REFINING, LLC, LBR  
LIQUIDATING TRUST, DAVID M.  
DUNN, LIMETREE BAY TERMINALS,  
LLC, DBA OCEAN POINT TERMINALS,  
ARCLIGHT CAPITAL PARTNERS, LLC,  
FREEPOINT COMMODITIES, LLC, EIG  
GLOBAL ENERGY PARTNERS, LLC, BP  
PRODUCTS NORTH AMERICA, INC.,  
UNIVERSAL PLANT SERVICES, (VI),  
LLC, EXCEL CONSTRUCTION &  
MAINTENANCE VI, INC., ELITE  
TURNAROUND SPECIALISTS, LTD.,  
PINNACLE SERVICES LLC, VERSA  
INTEGRITY GROUP, INC., NATIONAL  
INDUSTRIAL SERVICES, LLC, and  
JOHN DOES 1-100,

Defendants.

**Case No. 1:21-cv-00261-WAL-EAH**

**Action for Damage and Injunctive Relief**

**Jury Trial Demanded**

---

**NOTICE OF APPEARANCE**

PLEASE TAKE NOTICE that Quinn Burns, Esq., admitted to appear *pro hac vice*, hereby enters an appearance as additional counsel of record for Plaintiffs.

Dated: February 28, 2023

Respectfully Submitted,

/s/ Quinn Burns  
Quinn Burns, Esq. (Admitted *pro hac vice*)  
BURNS CHAREST LLP  
900 Jackson Street, Suite 500  
Dallas, Texas 75202  
Telephone: (469) 904-4550  
[qburns@burnscharest.com](mailto:qburns@burnscharest.com)



Korey A. Nelson, Esq. (R2012)  
BURNS CHAREST LLP  
365 Canal Street, Suite 1170  
New Orleans, LA 70130  
Telephone: (504) 799-2845  
[knelson@burnscharest.com](mailto:knelson@burnscharest.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on the 28<sup>th</sup> day of February 2023, I electronically filed the foregoing Notice of Appearance with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all parties to this action who receive electronic service through CM/ECF.

/s/ Quinn Burns  
Quinn Burns, Esq.